



**Dated: October 20, 2022**

**The following is ORDERED:**

Sarah A Hall  
United States Bankruptcy Judge

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE: )  
KEYSTONE GAS CORPORATION ) Case No. 22-12088-SAH  
 )  
Debtor. ) Chapter 11

**ORDER AUTHORIZING DEBTOR TO MAINTAIN INSURANCE POLICIES**

ON THIS DATE the Court considered the *Debtor's Motion for Order Authorizing the Debtor to Maintain Insurance Policies* (the “Motion”), filed by Keystone Gas Corporation (“Debtor” or “Keystone”), the debtor and debtor-in-possession in the above-referenced bankruptcy case.

The Debtor certifies to the Court that the Motion has been properly served as required by Fed. R. Bankr. P. 4001 and Local Bankruptcy Rules 4001-1 and 9013-1. The Motion was served by U.S. First Class Mail on October 4, 2022 to all parties listed on the Certificate of Service attached to the Motion, including the Debtor, the Debtor’s counsel, the list of the Debtor’s 20 largest unsecured creditors, the United States Trustee, counsel for the DIP Lender, all parties known to the Debtor who hold any liens or security interest in the Debtor’s assets who have filed

UCC-1 financing statements against the Debtor, or who, to any Debtor's knowledge, have asserted any liens on any of such Debtor's assets, the Internal Revenue Service and all taxing authorities of states in which the Debtor is doing business, and all parties in interest who have requested notice in the case. The Debtor further certifies that the Motion was served on the all parties requesting electronic service in this case via the Court's ECF noticing system, as specified on the Certificate of Service attached to the Motion, on October 4, 2022.

The Debtor further certifies that that no objections to the relief requested in the Motion were filed within the fourteen (14) day objection period stated in the Motion, which expired on October 18, 2022.

Findings of fact are based upon representation of counsel, and the Court finds good cause to enter the following order. It is hereby

**ORDERED** that the Motion is **GRANTED** as set forth herein. It is further

**ORDERED** that pursuant to sections 105(a), 363(c)(1), and 503(b) of the Bankruptcy Code and Bankruptcy Rules 4001, the Debtor is authorized to continue its Insurance Policies, and to perform its obligations with respect thereto, in the ordinary course. It is further

**ORDERED** that the Debtor is authorized to pay prepetition amounts owed to BankDirect Capital Finance pursuant to the Commercial Insurance Premium Finance and Security Agreement, dated June 7, 2022 (the "**Premium Finance Agreement**"), in the ordinary course and consistent with past practice. It is further

**ORDERED** that nothing in the Motion or this Order shall be deemed to authorize the Debtor to accelerate any payments not otherwise due prior to the date of this Order. It is further

**ORDERED** that notwithstanding the relief granted herein and any actions taken hereunder, nothing contained in this Order shall constitute, nor is it intended to constitute, an admission as to

the validity or priority of any claim against the Debtor, the creation of an administrative priority claim on account of the prepetition obligations sought to be paid, or the assumption or adoption of any contract or agreement under section 365 of the Bankruptcy Code. It is further

**ORDERED** that, notwithstanding the provisions of Bankruptcy Rule 6004(h), this Order shall be immediately effective and enforceable upon its entry. It is further

**ORDERED** that the Debtor is authorized to take all steps necessary or appropriate to carry out this Order. It is further

**ORDERED** that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

###

Approved for Entry:

/s/ Megan F. Clontz

Megan F. Clontz  
Spencer Fane LLP  
5700 Granite Parkway, Suite 650  
Plano, TX 75024  
972-324-0300  
Fax : 972-324-0301  
Email: mclontz@spencerfane.com

**PROPOSED COUNSEL FOR DEBTOR  
AND DEBTOR-IN-POSSESSION**